

North Carolina Security Breach Reporting Form
Pursuant to the Identity Theft Protection Act of 2005

*Indicated a mandatory field

*Name of the Company or Government Agency owning or licensing information affected by the entity experiencing breach:

BRENNAN RECUPERO CASCIONE SCUNGIO AND MCALLISTER LLP

Entity Type: GENERAL BUSINESS
Address: 362 BROADWAY
Apt/Suite/Building:
City: PROVIDENCE
State: RI
Zip Code: 02009
Telephone: (267) 930-4786
Fax:
Email: RLOUGHLIN@MULLEN.LEGAL

*Date Security breach Reporting Form Submitted: 11/22/2016
*Date the Security Breach was discovered: 08/15/2016
Breach Type: HACKERS/ UNAUTHORIZED ACCESS
*Estimated number of affected individuals: 2266
*Estimated number of NC residents affected: 5

Name of company or government agency maintaining or possessing information that was the subject of the Security Breach, if the agency that experienced the Security Breach is not the same entity as the agency reporting the Security Breach (pursuant to N.C.G.S. 75-65(b))

Describe the circumstances surrounding the Security Breach: SEE EXHIBIT 1.

Information Type: ACCOUNT #
SSN

*Regarding information breached, if electronic, was the information protected in some manner: YES

If YES, please describe the security measures protecting the

information:

*Describe any measures taken to prevent a similar Security Breach from occurring in the future:

STAFF DEVELOPMENT – IT GIVING SEMINAR ON CYBER SECURITY AND COMMON SCAMS.
A MORE ROBUST CYBERSECURITY POLICY WITH NOTIFICATIONS OF SANCTIONS FOR VIOLATIONS.
ESTABLISHMENT OF A 3 MONTH PASSWORD ROTATION SCHEDULE.
ACCESS TO THE FIRM'S FILE SHARE WILL BE REVISED FOR ALL EMPLOYEES TO PROVIDE A VISIBLE ACCESS ONLY TO NEED-TO-KNOW INDIVIDUALS.
ENCRYPTION OF THE SHARE FILE; DECRYPTION IS BASED CREDENTIALLED NEED-TO-KNOW INDIVIDUALS.
THE FIRM IS WORKING ON A LOG SYSTEM TO NOTE AND RECORD ACCESS, CHANGE AND COPY OF ALL DATA.
INSTALLATION AND PHASED ROLL OUT A UNIVERSAL EMAIL ENCRYPTION SYSTEM.
DEVELOPMENT OF A POLICY AND PROTOCOL FOR ELIMINATION OF PII FOR CLOSED FILES WITH TIMELINES – INTENT TO SCRUB CLOSED MATTERS OF ALL NONESSENTIAL PII.
THE IN PROCESS CREATION OF A SEPARATE DRIVE WHICH WILL HOUSE CLOSED CONFIDENTIAL DOCUMENTS WITH DEEPLY RESTRICTED ACCESS.

*Date affected NC residents were/will be notified:

11/22/2016

Describe the circumstances surrounding the delay in notifying affected NC residents pursuant to N.C.G.S. 75-65 (a) and (c):

If the delay was pursuant to a request from law enforcement pursuant to N.C.G.S. 75-65(c), please attach or mail the written request or the contemporaneous memorandum.

How NC residents were/will be notified? (pursuant to N.C.G.S. 75-65 (e)):

WRITTEN NOTICE

Please note if the business demonstrates that the cost of providing notice would exceed two hundred fifty thousand dollars (\$250,000) or that the affected class of subject persons to be notified exceeds 500,000, or if the business does not have sufficient contact information or consent to satisfy subdivisions (1), (2) , or (3) of this subsection, for only those affected persons without sufficient contact information or consent, or if the business is unable to identify particular affected persons, for only those unidentifiable affected persons. Substitute notice shall consist of all the following:

- Email notice when the business has an electronic mail address for the subject persons

- Conspicuous posting of the notice on the Web site page of the business, if one is maintained
- Notification to major statewide media

Please attach a copy of the notice if in written form or a copy of any scripted notice if in telephonic form.

Contact Information	ATTORNEY		
Affiliation with entity experiencing breach:			
Organization Name:	MULLEN COUGHLIN LLC		
Prefix:	MR		
*First Name:	RYAN		
Middle Name:	C		
*Last Name:	LOUGHLIN		
Suffix:			
Title:	PARTNER		
Address:	1275 DRUMMERS LANE		
Apt/Suite/building:	SUITE 302		
City:	WAYNE		
State:	PA	Zip Code:	19087
*Telephone:	(267) 930-4786	Fax:	(267) 930-4771
Email:	RLOUGHLIN@MULLEN.LEGAL		

Exhibit 1

We represent Brennan Recupero Cascione Scungio and McAllister LLP, 362 Broadway, Providence, Rhode Island 02009 (“Brennan Recupero”), and are writing to notify you of a data security incident that may affect the security of the personal information of five (5) North Carolina residents. The investigation into this incident is ongoing and will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Brennan Recupero does not waive any rights or defenses regarding the applicability of North Carolina law or personal jurisdiction.

Nature of the Cyber Security Incident

On August 15, 2016, the credentials for a Brennan Recupero attorney were briefly used by an unauthorized individual to remotely access its computer network. The unauthorized access was quickly discovered and Brennan Recupero immediately reset all user passwords to the network to prevent any further access to the network. In addition, Brennan Recupero launched an internal investigation and retained third-party forensic experts to determine whether the unauthorized individual accessed any data within our network and if so, the extent of that access. Brennan Recupero determined that while the unauthorized individual or individuals had access to Brennan Recupero’s network, certain personal information was accessible and may have been viewed by the unauthorized individual including individuals’ names, Social Security number, address and bank account information.

Notice to North Carolina Residents

On or around October 10, 2016, Brennan Recupero and its forensic experts completed a review of the files accessible to identify those whose information was accessible and the type of information related to these individuals that was contained in the accessible files. This review process involved both a programmatic and manual review of a variety of different file types to identify those who may be impacted. Given the complexity and volume of documents to be reviewed, this process took some time once the accessible files were identified. Brennan Recupero then moved to provide notice to the identified individuals who may be affected by this incident.

On November 22, 2016, Brennan Recupero began mailing notice letters to potentially affected individuals which includes five (5) North Carolina residents. The notice will be provided in substantially the same form as the letter attached here as ***Exhibit A***.

Other Steps Taken

Brennan Recupero is offering potentially affected individuals complimentary access to twelve (12) months of free credit monitoring and identity restoration services with AllClear ID. Additionally, Brennan Recupero is providing potentially affected individuals with information on how to protect against identity theft and fraud, including information on how to contact the Federal Trade Commission, the state attorney general, and law enforcement to report any attempted or actual identity theft and fraud. In addition to providing notice of this incident to

you, Brennan Recupero is providing written notice of this incident to other state regulators where required.

Exhibit A



00259
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

November 22, 2016

RE: Notice of Data Breach

Dear John Sample,

Brennan Recupero Cascione Scungio and McAllister LLP (“Brennan Recupero”) recently discovered an incident that may affect the security of your personal information. We write to provide you with information about the incident, steps taken since discovering the incident, and information on what you can do to better protect against the possibility of identity theft and fraud.

What Happened? On August 15, 2016, the credentials for a Brennan Recupero attorney were briefly used by an unauthorized individual to remotely access our computer network. The unauthorized access was quickly discovered and we immediately reset all user passwords to the network to prevent any further access to the network. In addition, we launched an internal investigation and retained third-party forensic experts to determine whether the unauthorized individual accessed any data within our network and if so, the extent of that access.

What Information Was Involved? We determined that while the unauthorized individual or individuals had access to Brennan Recupero’s network, certain of your personal information was accessible and may have been viewed by the unauthorized individual including your name, Social Security number and address.

What We Are Doing Brennan Recupero takes the security of your personal information very seriously. While we have no evidence your information was specifically impacted or that your information has been misused, we are offering you complimentary access to 12 months of free credit monitoring and identity restoration services with AllClear ID. The enclosed *Steps You Can Take To Protect Against Identity Theft and Fraud* contains instructions on how to enroll and receive these free services, as well as information on what you can do to better protect against identity theft and fraud. We are also notifying certain state regulators of this incident.

What You Can Do You can enroll to receive the free credit monitoring and identity restoration services. You can also review the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*.

For More Information You can call the call center we have set up for this incident at 1-855-865-6894. The call center is available Monday through Saturday, 9:00 a.m. to 9:00 p.m. E.S.T.



We take the privacy of your personal information seriously. We sincerely regret any inconvenience or concern this incident has caused you. The security of your information is a priority to us and we have taken precautionary measures to better prevent something like this from happening again.

Sincerely,

Benjamin M. Scungio

Benjamin M. Scungio

Ronald F. Cascione

Ronald F. Cascione

Steps You Can Take to Protect Against Identity Theft and Fraud

As an added precaution, we have arranged to have AllClear ID protect your identity for 12 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 12 months.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-865-6894 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Credit Monitoring: This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. For a child under 18 years old, AllClear ID ChildScan identifies acts of credit, criminal, medical or employment fraud against children by searching thousands of public databases for use of your child's information. To use this service, you will need to provide your personal information to AllClear ID.

You may sign up online at enroll.allclearid.com or by phone by calling 1-855-865-6894 using the following redemption code: Redemption Code.

Please note: Additional steps may be required by you in order to activate your phone alerts and monitoring options.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
(NY residents please call
1-800-349-9960)
<https://www.freeze.equifax.com>

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
1-888-909-8872
www.transunion.com/securityfreeze



You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. **For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-919-716-6400, www.ncdoj.gov. **For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement. **Rhode Island residents**: the Attorney General's office can be contacted at <http://www.riag.ri.gov/index.php>, consumers@riag.ri.gov or (401) 274-4400. There were approximately 1102 Rhode Island residents affected by this incident.



MULLEN
COUGHLIN

Ryan C. Loughlin
Office: 267-930-4786
Fax: 267-930-4771
Email: rloughlin@mullen.law

1275 Drummers Lane, Suite 302
Wayne, PA 19087

December 5, 2016

VIA EMAIL ONLY

North Carolina Attorney General's Office
Department of Justice
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
Email: consumer@ncdoj.gov

Re: **Supplemental Notice of Data Security Incident**

Dear Sir or Madam:

We write to supplement the November 22, 2016 Notice of Data Security Incident ("November 22 Notice") submitted on behalf of Brennan Recupero Cascione Scungio and McAllister LLP ("Brennan Recupero"). By providing this supplemental notice, Brennan Recupero does not waive any rights or defenses regarding the applicability of North Carolina law or personal jurisdiction.

Nature of the Cyber Security Incident

As noted in the November 22 Notice, the process to identify the potentially affected population was time consuming and involved the work of third party forensic investigators, Brennan Recupero and the clients who provided the information involved to Brennan Recupero. After identifying the potentially affected individuals, Brennan Recupero determined that they lacked address information for many of the potentially affected individuals. Brennan Recupero worked with a third party to locate the needed address information for the potentially affected individuals so that Brennan Recupero could provide them with written notice. This process was recently completed and the additional address information showed that the personal information of one hundred and nine (109) additional North Carolina residents was contained in files that were accessible to the unauthorized individual. The total number of potentially affected North Carolina residents is one hundred and fourteen (114). Brennan Recupero currently believes that no additional North Carolina residents were potentially affected by this incident but will further supplement this notice should it become aware of any new significant facts subsequent to its submission.

Mullen.law

North Carolina Attorney General's Office
December 5, 2016
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On December 5, 2016, Brennan Recupero will be mailing a notice letter to the additional potentially affected North Carolina residents in substantially the same form as the letter attached here as *Exhibit A*.

Contact Information

Should you have any questions regarding this supplemental notification or other aspects of the cyber security incident, please contact me at (267) 930-4786.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Ryan Loughlin", with a stylized flourish at the end.

Ryan C. Loughlin of
MULLEN COUGHLIN LLC

RCL:ncl

Enclosure

Exhibit A

Brennan, Recupero, Cascione, Scungio & McAllister, LLP
Attorneys At Law
Processing Center • P.O. BOX 141578 • Austin, TX 78714



03428
JOHN Q. SAMPLE
1234 MAIN STREET
ANYTOWN US 12345-6789

December 5, 2016

RE: Notice of Data Breach

Dear John Sample,

Brennan Recupero Cascione Scungio and McAllister LLP ("Brennan Recupero") recently discovered an incident that may affect the security of your personal information. We write to provide you with information about the incident, steps taken since discovering the incident, and information on what you can do to better protect against the possibility of identity theft and fraud.

What Happened? On August 15, 2016, the credentials for a Brennan Recupero attorney were briefly used by an unauthorized individual to remotely access our computer network. The unauthorized access was quickly discovered and we immediately reset all user passwords to the network to prevent any further access to the network. In addition, we launched an internal investigation and retained third-party forensic experts to determine whether the unauthorized individual accessed any data within our network and if so, the extent of that access.

What Information Was Involved? We determined that while the unauthorized individual or individuals had access to Brennan Recupero's network, certain of your personal information was accessible and may have been viewed by the unauthorized individual including your name, Social Security number and address.

What We Are Doing Brennan Recupero takes the security of your personal information very seriously. While we have no evidence your information was specifically impacted or that your information has been misused, we are offering you complimentary access to 24 months of free credit monitoring and identity restoration services with AllClear ID. The enclosed *Steps You Can Take To Protect Against Identity Theft and Fraud* contains instructions on how to enroll and receive these free services, as well as information on what you can do to better protect against identity theft and fraud. We are also notifying certain state regulators of this incident.

What You Can Do You can enroll to receive the free credit monitoring and identity restoration services. You can also review the enclosed *Steps You Can Take to Protect Against Identity Theft and Fraud*.

For More Information You can call the call center we have set up for this incident at 1-855-804-2467. The call center is available Monday through Saturday, 9:00 a.m. to 9:00 p.m. E.S.T.



01-02-4-00

We take the privacy of your personal information seriously. We sincerely regret any inconvenience or concern this incident has caused you. The security of your information is a priority to us and we have taken precautionary measures to better prevent something like this from happening again.

Sincerely,

Benjamin M. Scungio

Benjamin M. Scungio

Ronald F. Cascione

Ronald F. Cascione

Steps You Can Take to Protect Against Identity Theft and Fraud

As an added precaution, we have arranged to have AllClear ID protect your identity for 24 months at no cost to you. The following identity protection services start on the date of this notice and you can use them at any time during the next 24 months.

AllClear Identity Repair: This service is automatically available to you with no enrollment required. If a problem arises, simply call 1-855-804-2467 and a dedicated investigator will help recover financial losses, restore your credit and make sure your identity is returned to its proper condition.

AllClear Credit Monitoring: This service offers additional layers of protection including credit monitoring and a \$1 million identity theft insurance policy. For a child under 18 years old, AllClear ID ChildScan identifies acts of credit, criminal, medical or employment fraud against children by searching thousands of public databases for use of your child's information. To use this service, you will need to provide your personal information to AllClear ID.

You may sign up online at enroll.allclearid.com or by phone by calling 1-855-804-2467 using the following redemption code: Redemption Code.

Please note: Additional steps may be required by you in order to activate your phone alerts and monitoring options.

We encourage you to remain vigilant against incidents of identity theft and fraud, to review your account statements, and to monitor your credit reports for suspicious activity. Under U.S. law you are entitled to one free credit report annually from each of the three major credit reporting bureaus. To order your free credit report, visit www.annualcreditreport.com or call, toll-free, 1-877-322-8228. You may also contact the three major credit bureaus directly to request a free copy of your credit report.

At no charge, you can also have these credit bureaus place a "fraud alert" on your file that alerts creditors to take additional steps to verify your identity prior to granting credit in your name. Note, however, that because it tells creditors to follow certain procedures to protect you, it may also delay your ability to obtain credit while the agency verifies your identity. As soon as one credit bureau confirms your fraud alert, the others are notified to place fraud alerts on your file. Should you wish to place a fraud alert, or should you have any questions regarding your credit report, please contact any one of the agencies listed below.

Equifax
P.O. Box 105069
Atlanta, GA 30348
800-525-6285
www.equifax.com

Experian
P.O. Box 2002
Allen, TX 75013
888-397-3742
www.experian.com

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
800-680-7289
www.transunion.com

You may also place a security freeze on your credit reports. A security freeze prohibits a credit bureau from releasing any information from a consumer's credit report without the consumer's written authorization. However, please be advised that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services. If you have been a victim of identity theft, and you provide the credit bureau with a valid police report, it cannot charge you to place, list or remove a security freeze. In all other cases, a credit bureau may charge you a fee to place, temporarily lift, or permanently remove a security freeze. You will need to place a security freeze separately with each of the three major credit bureaus listed above if you wish to place a freeze on all of your credit files. To find out more on how to place a security freeze, you can use the following contact information:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
1-800-685-1111
(NY residents please call
1-800-349-9960)
<https://www.freeze.equifax.com>

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
1-888-397-3742
www.experian.com/freeze/center.html

TransUnion
P.O. Box 2000
Chester, PA 19022-2000
1-888-909-8872
www.transunion.com/securityfreeze



02-02-4

You can further educate yourself regarding identity theft, fraud alerts, and the steps you can take to protect yourself, by contacting the Federal Trade Commission or your state Attorney General. **For North Carolina residents**, the Attorney General can be contacted at 9001 Mail Service Center, Raleigh, NC 27699-9001, 1-919-716-6400, www.ncdoj.gov. **For Maryland residents**, the Attorney General can be contacted at 200 St. Paul Place, 16th Floor, Baltimore, MD 21202, 1-888-743-0023, www.oag.state.md.us. The Federal Trade Commission can be reached at: 600 Pennsylvania Avenue NW, Washington, DC 20580, www.identitytheft.gov, 1-877-ID-THEFT (1-877-438-4338); TTY: 1-866-653-4261. The Federal Trade Commission also encourages those who discover that their information has been misused to file a complaint with them. Instances of known or suspected identity theft should also be reported to law enforcement. This notice has not been delayed by law enforcement. **Rhode Island residents**: the Attorney General's office can be contacted at <http://www.riag.ri.gov/index.php>, consumers@riag.ri.gov or (401) 274-4400. There were approximately 1102 Rhode Island residents affected by this incident.